

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

Kathy Branham, Individually and as the  
Personal Representative of the Estate of  
Vernon Dean Branham,

Plaintiff,

vs.

Ashley English, Lynn Davis, Tamika Lewis,  
Kindra Bouknight, Allen McCoy, Susan  
Keener, Joyce Kelly, Matthew Haldeman,  
M.D., Britana Brown, David Morgan, and  
Timothy Mathis,

Defendants.

CASE NO.: 1:21-cv-2867-JD-SVH

**PLAINTIFF'S RESPONSES TO LOCAL  
RULE 26.01 INTERROGATORIES**

1. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**RESPONSE:**

**Plaintiff is unaware of any subrogation interest of any persons or legal entities at this time.**

2. As to each claim, state whether it should be tried by jury or nonjury and why.

**RESPONSE:**

**At this time, the Plaintiff would respectfully request a jury trial.**

3. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the

outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**RESPONSE:**

**Not applicable.**

4. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**RESPONSE:**

**The acts and/or omissions giving rise to this lawsuit developed and/or began in Winnsboro, South Carolina, in Fairfield County, which is in the Columbia Division of the South Carolina Federal Court Division.**

5. Is this action related, in whole or in part, to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related, regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involved the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.<sup>1</sup>

**RESPONSE:**

**No**

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<sup>1</sup> This information is required in addition to completion of the “related cases” block on the JS44 Civil Cover Sheet. Although the Civil Cover Sheet requires only that you disclose *pending* related cases, this interrogatory and this District’s assignment procedures require disclosure of *any prior* or *pending* related case whether civil or criminal. Therefore, both categories should be disclosed in response to this interrogatory as well as on the JS44 Civil Cover Sheet.

ELLIOTT, PHELAN & KUNZ, LLC

s/ Andrew W. Kunz  
Andrew W. Kunz  
U.S.D.C. Bar #: 11198  
Elliott, Phelan & Kunz, LLC  
P.O. Box 1405  
Georgetown, SC 29442  
(843) 546-0650 (phone)  
[andrew@elliottphelanlaw.com](mailto:andrew@elliottphelanlaw.com)

September 3, 2021  
Georgetown, SC

*ATTORNEY FOR THE PLAINTIFF*